

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SABRENA WHITT,

Plaintiff,

v.

**R & G STRATEGIC
ENTERPRISES, LLC**

Defendant.

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) Civil Action No. 1:16-cv-02492-RDB
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INITIAL JOINT STATUS REPORT

Defendant, R&G Strategic Enterprises, and Plaintiff Sabrena Whitt, by and through undersigned counsel hereby submit this Initial Joint Status Report in response to this Court's Proposed Scheduling Order. The Parties state as follows:

1. **Requests for Modification:** Due to Plaintiff's counsel's trial schedule, the Parties request that the dates for (a) Completion of Discovery; (b) Requests for Admission; and (c) Dispositive Pretrial Motions be modified as follows:

<u>Item to be Filed</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Completion of Discovery; Joint Status Report	November 25, 2016	December 26, 2016
Requests for Admission	December 2, 2016	January 3, 2017
Dispositive Pretrial Motions	December 26, 2016	January 27, 2017

2. **Consent to Proceed Before a Magistrate Judge:** The Parties do not consent to proceed before a Magistrate Judge for all further proceedings.
3. **Mediation Before a Magistrate Judge:** The Parties believe they would benefit from mediation before a Magistrate Judge; however, the Parties are still discussing the timing of such mediation and will contact the Court should they decide to pursue early mediation.
4. **Scope of Discovery:** The Parties anticipate that discovery may include the discovery of electronically stored information as well as personnel records and/or health records of the Plaintiff. The Parties have discussed the appropriate ways in which to exchange this information as well as the need for a Protective Order which the Parties will model after the sample Protective Order in this Court's Local Rules.

Respectfully submitted,

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Counsel for Plaintiff

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Counsel of Defendant

CERTIFICATE OF SERVICE

I certify that on July 27, 2016, I caused the foregoing to be filed with the Clerk via the Court's CM/ECF system, which gave notice to the following counsel of record:

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